

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EZ4MEDIA, INC., a Nevada corporation,

Plaintiff,

v.

RAYMOND P. NIRO, DAVID J. SHEIKH,
CHRISTOPHER J. LEE, NIRO, HALLER &
NIRO and NIRO, SCAVONE, HALLER &
NIRO,

Defendants-
Counterclaimants,
Third-Party
Plaintiffs,

v.

JOHN LICHTER and EZ4MEDIA, INC.,

Counterdefendants,

and

JOHN LICHTER, LEE GROSSMAN,
MARC E. FINEMAN, PHILIP E. RUBEN,
LEVENFELD PEARLSTEIN, LLC, AND
ARNSTEIN & LEHR, LLP,

Third-Party
Defendants.

Civil Action No. 11 C 684

Honorable Harry D. Leinenweber
Magistrate Judge Jeffrey T. Gilbert

**STIPULATED DISMISSAL OF CLAIMS AND COUNTERCLAIMS, WITH PREJUDICE,
AND NOTICE OF VOLUNTARY DISMISSAL OF THIRD-PARTY COMPLAINT**

I. Stipulated Dismissal of Claims and Counterclaims, With Prejudice

Plaintiffs/Counter-Defendants EZ4Media, Inc. and John Lichter (collectively,
“Plaintiffs”) and Defendants/Counterclaimants/Third-Party Plaintiffs Raymond P. Niro,

David J. Sheikh, Christopher J. Lee, Niro, Haller & Niro and Niro, Scavone, Haller & Niro (collectively, "Defendants") hereby stipulate and agree as follows:

All claims and counterclaims that were or that could have been brought by Plaintiffs, individually or collectively, against Defendants, individually or collectively, and by Defendants, individually or collectively, against Plaintiffs, individually or collectively in this lawsuit and/or based upon the allegations in this lawsuit are dismissed, with prejudice and in bar of further action.

Each of Plaintiffs and Defendants shall pay his/its own attorneys' fees and costs.

II. Notice of Dismissal of Third-Party Complaint

In accordance with Fed.R.Civ.P. 41(a)(1)(A)(i), Defendants, individually and collectively, hereby voluntarily dismiss their Third-Party Complaint against Third-Party Defendants Lee Grossman, Marc E. Fineman, Philip E. Ruben, Levenfeld Pearlstein, LLC, and Arnstein & Lehr, LLP, individually and collectively.

No pleading in response to Defendants' Third-Party Complaint has been served, and no evidence has been introduced on the Third-Party Complaint at a hearing or trial.

Defendants, individually or collectively, have not previously dismissed any federal- or state-court action based on or including the claims in the Third-Party Complaint.

Each of Defendants and Third-Party Defendants shall pay his/its own attorneys' fees and costs.

STIPULATED AND AGREED:

/s/Steven H. Mora

Steven H. Mora
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Attorneys for John Lichter and
EZ4Media, Inc.

/s/Paul K. Vickrey

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Attorneys for Raymond P. Niro,
David J. Sheikh
Christopher J. Lee
Niro, Haller & Niro and
Niro, Scavone, Haller & Niro

ENTERED this ____ day of April, 2011

United States District Judge